

BOIES SCHILLER FLEXNER LLP

David Boies (admitted pro hac vice)
333 Main Street
Armonk, NY 10504
Tel: (914) 749-8200
dboies@bsflfp.com

Mark C. Mao, CA Bar No. 236165
Beko Reblitz-Richardson, CA Bar No. 238027
44 Montgomery St., 41st Floor
San Francisco, CA 94104
Tel.: (415) 293-6800
mmao@bsflfp.com
brichardson@bsflfp.com

James Lee (admitted pro hac vice)
Rossana Baeza (admitted pro hac vice)
100 SE 2nd St., 28th Floor
Miami, FL 33131
Tel.: (305) 539-8400
jlee@bsflfp.com
rbaeza@bsflfp.com

Alison L. Anderson, CA Bar No. 275334
M. Logan Wright, CA Bar No. 349004
2029 Century Park East, Suite 1520
Los Angeles, CA 90067
Tel.: (213) 995-5720
alanderson@bsflfp.com
mwright@bsflfp.com

SUSMAN GODFREY L.L.P.

Bill Carmody (admitted pro hac vice)
Shawn J. Rabin (admitted pro hac vice)
Steven M. Shepard (admitted pro hac vice)
Alexander Frawley (admitted pro hac vice)
Ryan Sila (admitted pro hac vice)
One Manhattan West, 50th Floor
New York, NY 10019
Tel.: (212) 336-8330
bcarmody@susmangodfrey.com
srabin@susmangodfrey.com
sshepard@susmangodfrey.com
afrawley@susmangodfrey.com
rsila@susmangodfrey.com

Amanda K. Bonn, CA Bar No. 270891
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel.: (310) 789-3100
abonn@susmangodfrey.com

MORGAN & MORGAN

John A. Yanchunis (admitted pro hac vice)
Ryan J. McGee (admitted pro hac vice)
Michael F. Ram, CA Bar No. 104805
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505
jyanchunis@forthepeople.com
rmcgee@forthepeople.com
mram@forthepeople.com

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
JULIAN SANTIAGO, and SUSAN LYNN
HARVEY individually and on behalf of all
other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Judge: Hon. Richard Seeborg
Courtroom 3 – 17th Floor

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's material should be sealed. The material is included as exhibits to Plaintiffs' Response to Google LLC's Motion For Clarification of Class Definition.

Document or Portion of Document Sought to Be Sealed	Party Claiming Confidentiality	Basis for Sealing
Exhibit 1 to Declaration of Mark C. Mao	Google	Refers to Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 2 to Declaration of Mark C. Mao	Google	Refers to Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 3 to Declaration of Mark C. Mao	Google	Refers to Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 4 to Declaration of Mark C. Mao	Google	Refers to Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 5 to Declaration of Mark C. Mao	Google	Refers to Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 6 to Declaration of Mark C. Mao	Google	Refers to Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 7 to Declaration of Mark C. Mao	Google	Refers to Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 8 to Declaration of Mark C. Mao	Google	Refers to Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order

1		Only” pursuant to the Protective Order
2	Exhibit 9 to Declaration of Mark C. Mao	Google
3		Refers to Material Designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order
4		

5 Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the
6 responsibility to establish that its designated material is sealable.

7
8 Dated: March 22, 2024

Respectfully submitted,

9 By: /s/ Mark C. Mao

10 Mark C. Mao (CA Bar No. 236165)
11 mmao@bsflp.com
12 Beko Reblitz-Richardson (CA Bar No. 238027)
13 brichardson@bsflp.com
14 BOIES SCHILLER FLEXNER LLP
15 44 Montgomery Street, 41st Floor
16 San Francisco, CA 94104
17 Telephone: (415) 293 6858
18 Facsimile (415) 999 9695

16 David Boies (admitted *pro hac vice*)
17 dboies@bsflp.com
18 BOIES SCHILLER FLEXNER LLP
19 333 Main Street
20 Armonk, NY 10504
21 Telephone: (914) 749-8200

20 James Lee (admitted *pro hac vice*)
21 jlee@bsflp.com
22 Rossana Baeza (admitted *pro hac vice*)
23 rbaeza@bsflp.com
24 BOIES SCHILLER FLEXNER LLP
25 100 SE 2nd Street, Suite 2800
26 Miami, FL 33131
27 Telephone: (305) 539-8400
28 Facsimile: (305) 539-1307

Alison L. Anderson, CA Bar No. 275334
alanderson@bsflp.com
M. Logan Wright
mwright@bsflp.com

1 BOIES SCHILLER FLEXNER LLP
2 2029 Century Park East, Suite 1520
3 Los Angeles, CA 90067
4 Telephone: (813) 482-4814

5 Bill Carmody (*pro hac vice*)
6 bcarmody@susmangodfrey.com
7 Shawn J. Rabin (*pro hac vice*)
8 srabin@susmangodfrey.com
9 Steven Shepard (*pro hac vice*)
10 sshepard@susmangodfrey.com
11 Alexander P. Frawley
12 afrawley@susmangodfrey.com
13 Ryan Sila
14 rsila@susmangodfrey.com
15 SUSMAN GODFREY L.L.P.
16 One Manhattan West, 50th Floor
17 New York, NY 10001
18 Telephone: (212) 336-8330

19 Amanda Bonn (CA Bar No. 270891)
20 abonn@susmangodfrey.com
21 SUSMAN GODFREY L.L.P.
22 1900 Avenue of the Stars, Suite 1400
23 Los Angeles, CA 90067
24 Telephone: (310) 789-3100

25 John A. Yanchunis (*pro hac vice*)
26 jyanchunis@forthepeople.com
27 Ryan J. McGee (*pro hac vice*)
28 rmcgee@forthepeople.com
Michael F. Ram (CA Bar No. 238027)
mram@forthepeople.com
MORGAN & MORGAN, P.A.
201 N Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505
Facsimile: (813) 222-4736

Attorneys for Plaintiffs